

**REMARKS**

This Application has been carefully reviewed in light of the Office Action dated August 7, 2007 (the “*Office Action*”). At the time of the *Office Action*, Claims 1-45 were pending and rejected in the Application. Applicant amends Claim 2, 3, 6, 11, and 26 and cancels Claims 1, 13, and 14. Applicant submits that no new matter has been added. Independent Claim 45 remains in original format. As described below, Applicant believes all claims to be allowable over the cited references. Therefore, Applicant respectfully requests reconsideration and full allowance of all pending claims.

**Section 102 and 103 Rejections**

The Examiner rejects Claims 2, 14, 15, 27, 28, and 45 under 35 U.S.C. § 103(a) as being unpatentable over *Hsu* in view of U.S. Patent Application Publication No. 2005/0015472 issued to Catania et al. (“*Catania*”). The Examiner rejects Claims 1, 3-13, 16-26, and 29-44 under 35 U.S.C. § 102(e) as being anticipated U.S. Patent No. 7,146,544 issued to *Hsu* et al. (“*Hsu*”). Claims 1, 13, and 14 have been cancelled. For the reasons discussed below, Applicant respectfully requests reconsideration and allowance of Claims 2-12 and 15-45.

**A. Independent Claim 45**

Independent Claim 45 is rejected over the proposed *Hsu-Catania* combination. Independent Claim 45 has not been amended and recites:

A system for managing faults in a web services architecture comprising:  
a system interface operable to receive a service request in a web services format, *the system interface further operable to translate the service request into a non-web service format*;  
a service implementation operable to fulfill the service request, generate a fault report, and persist the fault, the persistence comprising storing the fault report in a persistent store, wherein generating a fault report comprises detecting a fault during the fulfillment of the service request, and *persisting the fault comprises attaching a unique identifier to the fault report*;

a fault service implementation operable to retrieve the fault report from the persistent store and *translate the fault report into a web service format*; and

a fault service interface operable to receive fault service requests and transmit a fault service response.

Because the proposed *Hsu-Catania* combination does not disclose, teach, or suggest at least the claim elements emphasized above, Applicant submits that Claim 45, as originally drafted, is allowable over the proposed *Hsu-Catania* combination.

1. *The Hsu-Catania combination does not disclose, teach, or suggest a system interface operable to “translate the service request into a non-web service format”*

As a first example of the deficiencies of the proposed *Hsu-Catania* combination, Applicant respectfully submits that the references do not disclose, teach, or suggest a system interface operable to “translate the service request into a non-web service format,” as recited in Claim 45. In the *Office Action*, the Examiner acknowledges that *Hsu* fails to disclose the recited claim features and instead relies on *Catania*.<sup>1</sup> Applicant respectfully disagrees with the Examiner’s finding that *Catania* discloses a system interface that is operable to receive a web service request in a web service format and then “translate the service request into a non-web service format,” as recited in Claim 45.

*Catania* discloses “three primary roles: service provider, service registry, and service requester.” (*Catania*, page 1, paragraph 7). “The service provider is the entity that provides access to the Web service and **publishes the service description in a service registry**.” (*Catania*, page 1, paragraph 7, emphasis added). By contrast, “[t]he service requestor finds the service description in a service registry or other location and can use the information in the description to bind to a service.” (*Catania*, page 1, paragraph 7, emphasis added). With regard to the messages that are sent, *Catania* discloses that “[w]eb services typically send

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<sup>1</sup> Applicant notes that the Examiner first states that the feature is disclosed by *Catania* (*Office Action*, page 8), but then states that “Lech” discloses the features (*Office Action*, page 9). Because the Examiner cites portions of *Catania* as disclosing these features and has not provided any citations to “Lech,” Applicant assumes the Examiner’s reference to “Lech” is a result of a typographical or editing error. Applicant further notes that “Lech” is not referred to in paragraph 2 on Page 14 or in the Notice of References Cited on Page 16.

XML messages formatted in accordance with the Simple Object Access Protocol (SOAP) specification.” (*Catania*, page 1, paragraphs 8). *Catania* further clarifies:

The XML messages are described using the Web Services Description Language (WSDL) specification, which, along with the Universal Description Discovery and Integration (UDDI) registry, provides a definition of the interface to a Web service and identifies service providers in a network. The WSDL specification is an XML-based language used to define Web services and describe how to access them. **An application trying to use a particular Web Service can often use WSDL to find the location of the Web service, the function calls available, and the format that must be followed to access the Web service. Therefore, the client first obtains a copy of the WSDL file from the server and then uses the information in this file to format a SOAP request.**

(*Catania*, page 1, paragraphs 8-9, emphasis added). Thus, *Catania* merely discloses that web service requests are sent in the WSDL format. The service requestor must obtain a copy of the WSDL file from the server and then format the request in the proper SOAP request format prior to it being sent. Because the SOAP format is a web service format,<sup>2</sup> Applicant contends that using the WSDL registry to format the request in a SOAP format is not analogous to “translat[ing] the service request into a non-web service format.” Furthermore, *Catania* explicitly describes that such formatting is done prior to the message being sent. Accordingly, there is no disclosure in *Catania* of a system interface that is operable to receive the service request and then “translate the service request into a non-web service format,” as recited in Claim 45.

2. *The Hsu-Catania combination does not disclose, teach, or suggest a service implementation operable to “persist the fault . . . wherein persisting the fault comprises attaching a unique identifier to the fault report”*

As a second example of the deficiencies of the proposed *Hsu-Catania* combination, Applicant respectfully submits that the references do not disclose, teach, or suggest a service implementation operable to “persist the fault . . . wherein persisting the fault comprises attaching a unique identifier to the fault report,” as recited in Claim 45. In the *Office Action*,

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<sup>2</sup> Webopedia defines SOAP as “a lightweight XML-based messaging protocol used to encode the information in Web service request and response messages before sending them over a network.” (See, [www.webopedia.com](http://www.webopedia.com), last visited 10/4/2007).

the Examiner specifically relies on *Hsu* for disclosure of the recited claim features. However, the cited portion of *Hsu* merely discloses:

Exceptions may have associated error data, which may include error codes, stored in the error catalog 210. Some categories of exceptions may not need error data stored in the error catalog 210. For example, exceptions that are concrete subclasses (i.e. a subclass that may have instances or be instantiated rather than inherited) of BusinessException do not need error data in the error catalog, while exceptions that are concrete subclasses of SystemException and FrameworkException do need their error data stored. The error catalog 210 may be loaded based on information in a configuration file or files 212. Among that information are keys used for message display in an error page. When an exception occurs and an action forward is called, the error catalog 210 may be accessed based on the error code and used to determine which error message to display in the resulting page. In some cases, the error code catalog 210 may also be accessed based on the type of error action forward and used to determine the error message to display in the resulting page. With the error code catalog 210, error JSP pages may remain generic. The error message may be determined at runtime and, therefore, may be plugged into the framework of a JSP.

(*Hsu*, column 8, lines 36-54). Although the cited portion discusses the use of error codes, *Hsu* only indicates that the error codes are used to identify the type of message to display and further, indicates that the error codes are applied to “categories of exceptions.” Portions of *Hsu* immediately preceding the portion cited by the Examiner state:

The interface for directing the flow of an HTTP request in the event of an exception is based on the categories of exceptions. There may be three separate abstract subclasses of WPAException that all exceptions must extend. In this way, exceptions may be easily classified. Depending on which subclass of WPAException a specific exception falls into, one of two action forwards may be called, with the exception or an error code passed to it . . .

(*Hsu*, column 8, lines 18-20). Because *Hsu* merely discloses “error codes” generally and states that exceptions are classified into categories of exceptions, Applicant respectfully submits that *Hsu* and the proposed *Hsu-Catania* combination do not disclose, teach, or suggest “a service implementation operable to “persist the fault . . . wherein persisting the fault comprises attaching a unique identifier to the fault report,” as recited in Claim 45.

3. *The Hsu-Catania combination does not disclose, teach, or suggest a fault service implementation operable to “translate the fault report into a web service format”*

As a third example of the deficiencies of the proposed *Hsu-Catania* combination, Applicant respectfully submits that the references do not disclose, teach, or suggest a fault service implementation operable to “translate the fault report into a web service format,” as recited in Claim 45. In the *Office Action* the Examiner provides no citation to any specific reference and instead merely states “e.g., WSDL.” (*Office Action*, page 12). Applicant is not sure what this means. However, Applicant submits that neither *Hsu* nor *Catania* disclose the recited features and operations.

To the extent that *Hsu* discloses reporting faults or providing a fault report, *Hsu* only discloses that “the error handler or manager 128 functions to track or chain errors occurring in series, catalog error messages based on error codes, and display error messages using an error catalog.” (*Hsu*, column 7, lines 9-12). The tracking, cataloging, and displaying of errors is not analogous to providing a fault service implementation operable to “translate the fault report into a web service format,” as recited in Applicant’s Claim 45.

*Catania* does not make up for these deficiencies. As discussed above, *Catania* merely discloses that “[w]eb services typically send XML messages formatted in accordance with the Simple Object Access Protocol (SOAP) specification.” (*Catania*, page 1, paragraphs 8). Thus, *Catania* merely discloses that web service requests are sent in the WSDL format. The service requestor must obtain a copy of the WSDL file from the server and then format the request in the proper SOAP request format prior to it being sent. There is no disclosure of providing a fault service implementation operable to “translate the fault report into a web service format,” as recited in Applicant’s Claim 45.

For at least these reasons, Applicant respectfully requests reconsideration and allowance of independent Claim 45.

**B. Independent Claim 2**

In the *Office Action*, the Examiner rejects Claim 2 over the proposed *Hsu-Catania* combination. Claim 2 has been rewritten in independent form to include the limitations of Claim 1, which is cancelled. As amended, Claim 2 includes certain features that are analogous to those discussed above with regard to Claim 45. For example, Claim 2 recites a method that includes “receiving a service request in a web service language” and “translating the service request into a non-web service language.” Accordingly, for reasons similar to those discussed above in Section (A)(1) of this response, Applicant respectfully submits that the proposed *Hsu-Catania* combination does not disclose, teach, or suggest the each and every element recited in Applicant’s now independent Claim 2.

For at least these reasons, Applicant respectfully requests reconsideration and allowance of independent Claim 2, together with Claims 3-10 that depend on Claim 2.

**C. Independent Claims 11 and 26**

In the *Office Action*, the Examiner rejects Claims 11 and 26 over *Hsu*. However, independent Claims 11 and 26, as amended, include certain features that are analogous to those discussed above with regard to Claim 45. For example, amended Claim 11 recites “ a service interface operable to . . . receive a service request via a network, the service request received in a web service language; and translate the service request into a non-web service language.” As another example, amended Claim 26 recites a “web service module operable to . . . receive a service request via a network, the service request received in the web service language; and translate the service request into a non-web service language.” Accordingly, for reasons similar to those discussed above in Section (A)(1) of this response, Applicant respectfully submits that the *Hsu*, even when combined with other cited references, does not disclose, teach, or suggest the each and every element recited in Applicant’s independent Claims 11 and 26.

For at least these reasons, Applicant respectfully requests reconsideration and allowance of independent Claims 11 and 26, together with Claims 12 and 15-25 that depend on Claim 11 and Claims 27-46 that depend on Claim 26.

**CONCLUSION**

Applicant has made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clear and apparent, Applicant respectfully requests reconsideration and allowance of the pending claims.

Applicant does not believe any fees are due. However, the Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. 05-0765 of Electronic Data Systems Corporation.

If there are matters that can be discussed by telephone to advance prosecution of this application, Applicant invites the Examiner to contact its attorney at the number provided below.

Respectfully submitted,  
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